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*Attorneys for Sonos, Inc.*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

GOOGLE LLC,  
Plaintiff and Counter-defendant,  
v.  
SONOS, INC.,  
Defendant and Counter-claimant.

Case No. 3:20-cv-06754-WHA  
Related to Case No. 3:21-cv-07559-WHA

**DECLARATION OF ELIZABETH  
MOULTON IN SUPPORT OF  
STIPULATED REQUEST FOR ORDER  
EXTENDING DEADLINES FOR  
EXPERT DISCOVERY, EXPERT  
REPORTS, AND DISPOSITIVE  
MOTIONS**

1 I, Elizabeth Moulton, declare as follows and would so testify under oath if called upon to  
2 do so:

3 1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel  
4 of record to Sonos, Inc. (“Sonos”) in the above-captioned matter. I am a member in good standing  
5 of the Bar of the State of California. I make this declaration based on my personal knowledge,  
6 unless otherwise noted. If called, I can and will testify competently to the matters set forth herein.

7 2. I make this declaration in support of Sonos’s and Google LLC’s (“Google”) (collectively, “Parties”) Stipulated Request for Order Extending Deadlines for Expert Discovery,  
8 Expert Reports, and Dispositive Motions.  
9

10 3. The Parties believe that an extension of the remaining expert discovery, expert  
11 report, and dispositive motion deadlines is necessary and desirable to adequately complete expert  
12 discovery and prepare dispositive motions for the Court. The Parties believe that extensions for  
13 the Expert rebuttal and the close of Expert discovery are necessary to fully address the key issues  
14 in this case.

15 4. The Parties agree that continuing the remaining deadlines for expert discovery,  
16 expert reports, and dispositive motions will not affect the Parties’ability to comply with the other  
17 deadlines set forth in this case.

18 5. With respect to Civil L.R. 6-2(a)(2), I am aware of eight previous modifications to  
19 the case schedule based on my review of the docket. On March 12, 2022, the Parties stipulated to  
20 an extension of Google’s deadline to answer or move to dismiss Sonos’s counterclaims to seven  
21 days after the Court’s order on Google’s motion to dismiss in the related case. Dkt. 156. On May  
22 18, 2022, the Court vacated the initial patent showdown trial date and set the trial for October 3,  
23 2022. Dkt. 269. On May 4, 2022, the Court granted the Parties’stipulated request to extend the  
24 mediation deadline to accommodate their preferred mediator’s schedule. Dkt. 245. On July 15,  
25 2022, the Court granted the Parties’stipulated request to extend expert pretrial deadlines for the  
26 patent showdown trial. Dkt. 304. On August 22, 2022, the Court granted the Parties’stipulated  
27 request to extend the expert discovery deadline for the patent showdown trial. Dkt. 328. On  
28 November 14, 2022, the Court granted the Parties’stipulated request to extend expert report and

1 discovery deadlines. Dkt. 402. On December 7, 2022, the Court granted the Parties' stipulated  
2 request to extend the deadline for Google's Opposition to Sonos's Motion for Leave to Amend  
3 Infringement Contentions Pursuant to Patent L.R. 3-6. Dkt. 417. On December 22, 2022, the  
4 Court granted the Parties' stipulated request to extend the deadline for Expert Discovery, Expert  
5 Reports, and Dispositive Motions.

6 I declare under penalty of perjury under the law of the United States of America that the  
7 foregoing is true and correct to the best of my knowledge. Executed this 20th day of January,  
8 2023 in Zephyr Cove, Nevada.

9 /s/ Elizabeth Moulton

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**ECF ATTESTATION**

I, Elizabeth Moulton, am the ECF User whose ID and password are being used to file this Declaration. In compliance with Civil Local Rule 5-1, I hereby attest that Charles K. Verhoeven, counsel for Google, has concurred in the aforementioned filing.

Dated: January 20, 2023

By: /s/ Elizabeth Moulton  
Elizabeth Moulton